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Via ECF and Electronic Mail

Honorable Gregory H. Woods, U.S.D.J. United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007

Re: Revised Adjournment Request

United States v. Edward Shin Case No.: 1:19-cr-00552-GHW

Dear Judge Woods:

I represent Edward Shin in the above-referenced matter which is scheduled for a status conference before Your Honor on Tuesday, January 7, 2020 at 9:00 a.m.

As I advised in my previous letters to Your Honor today, I am requesting an adjournment of the status conference as I recently had two surgeries on my leg and my doctor has advised that I should not drive or stand for long periods of time until mid-January. In addition, today, I received a superseding indictment on this matter and additional time is needed for review of same.

I have spoken to Assistant U.S. Attorney Tara LaMorte and she has consented to adjourning the status conference. The parties propose January 21, 2020 at 10:00 a.m. or alternatively January 23, 2020 at 10:00 a.m. as the new date for the status conference.

The parties have agreed that time between January 7, 2020 and the new status conference will be excludable under the Speedy Trial Act because defense counsel, for the reasons set forth herein, needs additional time to adequately prepare a defense and to be prepared to attend the pretrial conference.

I have enclosed a proposed Order for Your Honor's review. We have drafted the Order with the January 21, 2020 date, but as noted above we are also available on January 23, 2020. Thank you.

Respectfully submitted,

Paul B. Brickfield

enc. (via electronic mail only)

cc: Assistant U.S. Attorney Tara LaMorte (via ECF and electronic mail w/enc.)
Assistant U.S. Attorney Daniel Tracer (via ECF and electronic mail w/enc.)